

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION**

NUCLEAR DEVELOPMENT LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 5:18-CV-01983-LCB
	)	UNOPPOSED
TENNESSEE VALLEY	)	
AUTHORITY,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION TO FILE UNDER SEAL**

Defendant Tennessee Valley Authority (“TVA”) hereby moves to file under seal its unredacted brief in support of its motion for summary judgment and the exhibits attached to that brief that contain confidential information. Plaintiff is being served with unredacted copies.

TVA is filing this motion to comply with paragraph 11 of this Court’s Protective Order dated July 1, 2019. (Doc. 47). That provision requires all briefs and other papers containing or referring to materials designated as confidential by one of the parties as confidential to be filed with a motion to seal. The table of contents for the exhibits to the brief identifies the exhibits that contain confidential information. This table of contents is attached hereto as Exhibit A.

TVA is simultaneously filing redacted copies of its brief and exhibits using the Court's CM/ECF system. TVA will deliver an unredacted copy of the brief by email to the Court's chambers. TVA will deliver by hand delivery to the Clerk unredacted copies of the brief and exhibits to be uploaded if this motion is granted. The copies delivered to the Clerk will be in paper format and on a thumb-drive in pdf format.

TVA requests that the Court grant this motion to allow the filing under seal of TVA's unredacted brief and exhibits as timely filings for a summary judgment motion under the Court's Scheduling Order.

Respectfully submitted this 23rd day of September, 2020.

s/ Matthew H. Lembke  
Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2020, a true and correct copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record:

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